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Attorneys for Defendants COUNTY OF LOS  
ANGELES and WILLIAM T. FUJIOKA  
(erroneously sued and served herein as LOS  
ANGELES COUNTY BOARD OF SUPERVISORS;  
and WILLIAM T. FUJIOKA)

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

REVEREND FATHER IAN  
ELLIOTT DAVIES; REVEREND J.  
EDWIN BACON, JR.; SHAKEEL  
SYED; RABBI HAROLD M.  
SCHULWEIS; REVEREND TERA  
LITTLE; RABBI JOHN ROSOVE;  
REVEREND PETER LAARMAN;  
DAVID N. MYERS; and RABBI  
AMY BERNSTEIN,

Plaintiffs,

v.

LOS ANGELES COUNTY BOARD  
OF SUPERVISORS; and WILLIAM  
T. FUJIOKA,

Defendants.

**Case No. CV14-0907CAS-FFMx**

**DEFENDANTS' TRIAL BRIEF**

**Hon. Christina A. Snyder**

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1 TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Defendants, COUNTY OF LOS ANGELES and WILLIAM T. FUJIOKA  
3 (erroneously sued and served herein as LOS ANGELES COUNTY BOARD OF  
4 SUPERVISORS; and WILLIAM T. FUJIOKA) ("Defendants") submit their Trial  
5 Brief, pursuant to Local Rule 16-11.2:

6 The parties have submitted papers in support of and in opposition to  
7 Plaintiffs' Motion for Permanent Injunction, which sets forth the legal and factual  
8 issues in dispute. In order to avoid burdening the court with needless duplication of  
9 argument and authorities already submitted to the court, Defendants refer to and  
10 incorporate herein by reference, their Opposition to Plaintiffs' Motion for  
11 Permanent Injunction and documents filed concurrently therewith.

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14 Dated: October 27, 2015

MARANGA \* MORGENSTERN  
Kenneth A. Maranga  
Frank J. Ozello, Jr.  
Patricia Molly Ford

17 GREINES, MARTIN, STEIN & RICHLAND, LLP  
Timothy T. Coates

19 By: /S/

20 Kenneth A. Maranga, Esq.  
Frank J. Ozello, Jr.  
Patricia Molly Ford  
21 Attorneys for Defendants COUNTY OF LOS  
22 ANGELES and WILLIAM T. FUJIOKA  
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**PROOF OF SERVICE**  
**[C.C.P. §1013]**

STATE OF CALIFORNIA     )  
COUNTY OF LOS ANGELES    ) ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 5850 Canoga Ave., Suite 600, Woodland Hills, CA 91367.

On **October 27, 2015**, I served the foregoing document entitled **DEFENDANTS' TRIAL BRIEF** on all parties in this action as follows:

**PLEASE SEE ATTACHED SERVICE LIST.**

— **By Mail.** By placing a true copy thereof enclosed in a sealed envelope. I am "readily familiar" with the firm's practice of collection and processing for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with first class postage thereon fully paid at Woodland Hills, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or the postage meter is more than one day after day of deposit for mailing in this Proof of Service.

— **By Telefax.** I transmitted said document by telefax to the offices of the addressees at the telefax numbers on the attached Service List.

— **By Personal Service.** I delivered such envelope by hand to the addressee(s).

— **By Overnight Courier.** I caused the above-referenced document(s) to be delivered to an overnight courier service for next day delivery to the above addressee(s).

— **By Email Transmission.** I caused the abovementioned document(s) to be transmitted by email to the address(es) listed below at their respective email address(es) as listed and described below. I am "readily familiar" with this office's practice for transmissions by email. Under that practice transmissions are sent as soon as possible and are repeated, if necessary, until they are reported as complete and without error. In sending the foregoing document(s) by email, I followed this office's ordinary business practices. The sending email address is @marmorlaw.com.

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The below listed individuals are registered with the Court to receive notice of electronically filed documents and will therefore be served via the Court's ECF System:

<p>Linda M. Burrow, Esq.  <u>burrow@caldwell-leslie.com</u>          Andrew Esbenshade, Esq.  <u>esbenshade@caldwell-leslie.com</u>          Jeffrey M. Chemerinsky, Esq.  <u>chemerinsky@caldwell-leslie.com</u>  <b>CALDWELL LESLIE &amp; PROCTOR, PC</b>          725 South Figueroa Street - 31<sup>st</sup> Floor          Los Angeles, CA 90017-5524          Telephone: (213) 629-9040          Facsimile: (213) 629-9022</p> <p>-and-</p> <p>Mark D. Rosenbaum, Esq.  <u>mrosenbaum@aclu-sc.org</u>          Peter Eliasberg, Esq.  <u>peliasberg@aclu-sc.org</u>  <b>ACLU FOUNDATION OF SOUTHERN CALIFORNIA</b>          1313 West 8<sup>th</sup> Street          Los Angeles, CA 90017          Telephone: (213) 977-9500          Facsimile: (213) 977-5297</p>	<p>Attorneys for Plaintiffs</p> <p><i>REVEREND FATHER IAN ELLIOTT DAVIES; REVEREND J. EDWIN BACON, JR.; SHAKEEL SYED; RABBI HAROLD M. SCHULWEIS; REVEREND TERA LITTLE; RABBI JOHN ROSEVE; REFEREND PETER LAARMAN; DAVID N. MYERS; and RABBI AMY BERNSTEIN</i></p>
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<p>Hon. Christina A. Snyder  <b>UNITED STATES DISTRICT COURT</b>  <b>Courtroom 5, 2<sup>nd</sup> Floor</b>          312 N. Spring Street          Los Angeles, CA 90012</p>	<p><b>(COURTESY COPY – BOX)</b></p>

1 Magistrate Frederick F. Mumm  
2 UNITED STATES DISTRICT COURT  
3 Courtroom E, 9<sup>th</sup> Floor  
4 312 N. Spring Street  
5 Los Angeles, CA 90012

(COURTESY COPY – BOX)

6 X (Federal) I declare under penalty of perjury that the foregoing is true and  
7 correct, and that I am employed in the office of a member of the bar of this  
8 Court at whose direction the service was made.

9 Executed on **October 27, 2015**, at Woodland Hills, California.

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11 Suzanne Snyder  
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